

ATTACHMENT F

CERTIFICATION

To: United States Department of Justice
Criminal Division, Fraud Section
Attention: Chief of the Fraud Section

United States Department of Justice
Criminal Division, Money Laundering and Asset Recovery Section (“MLARS”)
Attention: Chief of the MLARS Section

United States Department of Justice
United States Attorney’s Office
Eastern District of New York (“EDNY”)
Attention: United States Attorney for EDNY

Re: Plea Agreement Compliance Certification

The undersigned certify, pursuant to Paragraph 9 of the Plea Agreement (the “Agreement”) filed on March 1, 2024, in the United States District Court for the Eastern District of New York, by and between the United States of America and GUNVOR S.A. (the “Company”), that the undersigned are aware of the Company’s compliance obligations under Paragraphs 9 and 10 and Attachment C of the Agreement, and that, based on the undersigned’s review and understanding of the Company’s anti-corruption compliance program, the Company has implemented an anti-corruption compliance program that meets the requirements set forth in Attachment C to the Agreement. The undersigned certifies that such compliance program is reasonably designed to detect and prevent violations of the Foreign Corrupt Practices Act and other applicable anti-corruption laws throughout the Company’s operations. The undersigned further certifies that based on a review of the Company’s reports submitted to the Department of Justice, Criminal Division, Fraud Section and Money Laundering and Asset Recovery Section and the United States Attorney’s Office for the Eastern District of New York pursuant to Paragraph 25 of the Agreement, the reports were true, accurate, and complete as of the date they were submitted.

The undersigned hereby certify that they are respectively the Chairman of the Board of Directors and the Global Head of Ethics and Sustainability of GUNVOR S.A. and that each has been duly authorized by the Company to sign this Certification on behalf of the Company.

This Certification shall constitute a material statement and representation by the undersigned and by, on behalf of, and for the benefit of, the Company to the executive branch of the United States for purposes of 18 U.S.C. § 1001, and such material statement and representation shall be deemed to have been made in the Eastern District of New York. This Certification shall also constitute a record, document, or tangible object in connection with a matter within the jurisdiction of a department and agency of the United States for purposes of 18 U.S.C. § 1519, and such record, document, or tangible object shall be deemed to have been made in the Eastern District of New York.

Date: _____ Name (Printed): _____

Name (Signed): _____
Chairman of the Board of Directors
GUNVOR S.A.

Date: _____ Name (Printed): _____

Name (Signed): _____
Global Head of Ethics and Sustainability
GUNVOR S.A.